



August 20, 2012

David Danner, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

Re: UT-120451 - Comments on Proposed Rule Revisions to WAC 480-120-251

Dear Mr. Danner:

The Washington Independent Telecommunications Association (WITA) hereby submits its comments in this matter. Please note that these comments, while brief, address an issue of great significance to our members and their customers.

WITA opposes an opt-in approach. WITA supports an opt-out approach as we believe that an opt-in provision is more beneficial to the customers. Those customers that choose to no longer receive a directory can make that election at very little or no cost. Customers who choose to "go green" are probably highly motivated to make the choice to opt-out.

WITA believes that, in the areas served by its smaller members, the number of customers who desire to continue to receive directories far exceeds the number of customers who prefer not to receive them. Thus, an opt-in approach may be expected to result in a far greater burden on company customer service resources, and a burden upon customers, than would result from an opt-out regime. An opt-in regime carries a risk of disappointed customer expectations, especially for those customers who have become accustomed to the service of regularly receiving a directory without the requirement of their having to take action to secure that result. To the extent that there are customers who fail to opt-in in a timely manner, there will likely be an increase in calls to the

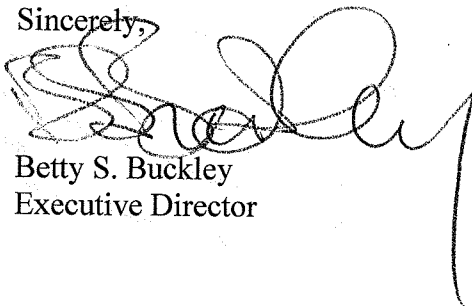
customers' local exchange company asking about directories that were not received. This could result in many requests for directories after the bulk distribution of directories has been accomplished. This will cause an increased burden on the company's customer service representatives and the company will have to pay to have directories sent on a non-bulk basis. If the number of customers requesting directories is substantial, which we believe will be the case for most WITA members, the extra resources required to accommodate this change could be significant. It would also be a disservice to customers who have become accustomed to receiving directories in a timely fashion and would no longer do so as a result of the customers having failed to opt-in in time be included in the bulk distribution.

Another disadvantage of using an opt-in provision is that it would be very difficult to determine in advance how many directories would need to be printed. Having to make subsequent printing runs of directories is an expensive proposition. The only way the companies could avoid that expense would be to print far more directories than might be needed in order to ensure that there would be enough on hand. While this would defeat the environmental considerations it would be much cheaper than ordering subsequent reprints of the directories. For many of WITA's members, an opt-out approach would simply be far more efficient from a cost and resource standpoint, and more convenient for the majority of their customers.

If the Commission believes that an opt-in provision is the way to go, then WITA supports the idea that directories below a certain size that combine white pages and yellow pages should be exempt from the opt-in requirement. Small directories that are published on behalf of WITA's smaller members do not impose a significant burden measured by ecological considerations. For all the reasons why WITA does not support an opt-in provision as a general rule, WITA believes that an exemption from any opt-in requirement is appropriate for the smaller directories and urges the Commission to exempt such directories from any opt-in requirement.

WITA looks forward to further exploration of this issue at the hearing scheduled for September 12, 2012.

Sincerely,



Betty S. Buckley  
Executive Director